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12 *Attorneys for Defendant*  
13 *Correct Care Solutions, LLC*

14

15

UNITED STATES DISTRICT COURT

16

DISTRICT OF NEVADA

17

18 ROSEN MARIANO, An individual,

Case No. 2:18-cv-01911-APG-GWF

19

Plaintiff,

20

vs.  
21 THE CITY OF LAS VEGAS, a political  
22 subdivision of the State of Nevada,  
23 CORRECTIONAL HEALTHCARE  
24 COMPANIES, INC., A Foreign Corporation,  
25 CORRECT CARE SOLUTIONS LLC, A  
26 Foreign Limited Liability Company,  
27 MICHELLE FREEMAN, Chief of Detention  
28 Enforcement for the City of Las Vegas,  
HEALTH CARE WORKER DOES 1-10,  
DOES 21-99 inclusive, ROE  
CORPORATIONS 100-199, inclusive,

**STIPULATION TO CONTINUE  
DEFENDANT'S REPLY TO  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT [DOC 51 and  
Doc 55]**

29

Defendants.

30

31 The parties, by and through their respective counsel of record, hereby stipulate and  
32 request that this Court extend the deadline for Defendant to file their respective Reply to  
33 Plaintiff's Oppositions to Defendant's Motions for Summary Judgment (Doc 51 and Doc  
34 55) in the above captioned case, up to and including January 11, 2021.

35

36

This request for an extension of time is not sought for any improper purpose or  
other purpose of delay.

1 Wherefore, the parties respectfully request that this Court extend the time for  
2 Defendant to file its Reply to Plaintiff's Oppositions to Defendant's Motion for Summary  
3 Judgment (Doc 51 and Doc 55), up to and including January 11, 2021.

4 DATED: December \_\_\_\_\_, 2020

DATED: December \_\_\_\_\_, 2020

5 THE GALLIHER LAW FIRM

LEWIS BRISBOIS BISGAARD & SMITH  
6 LLP

7 */s/ Keith E. Galliher, Jr.*

*/s/ John M. Orr*

8 KEITH E. GALLIHER, JR., ESQ.  
Nevada Bar No. 220  
9 1850 E. Sahara Avenue, Suite 107  
Las Vegas, Nevada 89104  
10 Attorneys for Plaintiffs

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6385 S. Rainbow Boulevard, Suite 600  
11 Las Vegas, Nevada 89118  
12 Attorneys for Correct Care Solutions, LLC

13 DATED: December \_\_\_\_\_, 2020

14  
15 */s/ John A. Curtas*

16 BRADFORD R. JERBIC, ESQ.  
Nevada Bar No. 1056  
17 JOHN A. CURTAS  
Nevada Bar No. 1841  
18 495 S. Main Street, Sixth Floor  
Las Vegas, Nevada 89101  
19 Attorneys for City of Las Vegas  
20 and Michele Freeman

21  
22  
23 **IT IS SO ORDERED**

24 DATED: December 2, 2020

25  
26  
27   
UNITED STATES DISTRICT JUDGE

## Rokni, Roya

**From:** John A. Curtas <jacurtas@LasVegasNevada.GOV>  
**Sent:** Wednesday, December 2, 2020 9:53 AM  
**To:** Orr, John; Keith Galliher; Kathleen Gallagher  
**Cc:** Cindy Kelly; Rokni, Roya  
**Subject:** [EXT] RE: CCS adv Mariano\_\_Stip to Extend Deadline for Reply

External Email

Fine with me.

### John A. Curtas

Deputy City Attorney  
City Attorney's Office | Civil Division  
**702-229-2125 (direct) | 702-528-7454 (cell)**  
495 South Main Street, Sixth Floor | Las Vegas, NV 89101



lasvegasnevada.gov



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**From:** Orr, John <John.Orr@lewisbrisbois.com>  
**Sent:** Wednesday, December 02, 2020 9:25 AM  
**To:** Keith Galliher <KGalliher@galliherlawfirm.com>; Kathleen Gallagher <KGallagher@galliherlawfirm.com>; John A. Curtas <jacurtas@LasVegasNevada.GOV>  
**Cc:** Cindy Kelly <CKelly@LasVegasNevada.GOV>; Rokni, Roya <Roya.Rokni@lewisbrisbois.com>  
**Subject:** CCS adv Mariano\_\_Stip to Extend Deadline for Reply

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**Rokni, Roya**

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**From:** Orr, John  
**Sent:** Wednesday, December 2, 2020 1:01 PM  
**To:** Rokni, Roya  
**Subject:** FW: CCS adv Mariano\_\_Stip to Extend Deadline for Reply

**John M. Orr**  
Attorney  
Las Vegas Rainbow  
702.693.4352 or x7024352

---

**From:** Keith Galliher <KGalliher@galliherlawfirm.com>  
**Sent:** Wednesday, December 2, 2020 9:29 AM  
**To:** Orr, John <John.Orr@lewisbrisbois.com>  
**Cc:** Kathleen Gallagher <KGallagher@galliherlawfirm.com>  
**Subject:** [EXT] RE: CCS adv Mariano\_\_Stip to Extend Deadline for Reply

External Email

Hi John: It looks fine. You may esign for me.

---

**From:** Orr, John <[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)>  
**Sent:** Wednesday, December 2, 2020 9:25 AM  
**To:** Keith Galliher <[KGalliher@galliherlawfirm.com](mailto:KGalliher@galliherlawfirm.com)>; Kathleen Gallagher <[KGallagher@galliherlawfirm.com](mailto:KGallagher@galliherlawfirm.com)>; 'John A. Curtas' <[jacurtas@LasVegasNevada.GOV](mailto:jacurtas@LasVegasNevada.GOV)>  
**Cc:** Cindy Kelly <[CKelly@LasVegasNevada.GOV](mailto:CKelly@LasVegasNevada.GOV)>; Rokni, Roya <[Roya.Rokni@lewisbrisbois.com](mailto:Roya.Rokni@lewisbrisbois.com)>  
**Subject:** CCS adv Mariano\_\_Stip to Extend Deadline for Reply

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